

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND
3 MELVIN NEWSOME, et al. * CIVIL ACTION S01-2257
4 Plaintiffs *
5 vs. Baltimore, Maryland
6 *
7 UP-TO-DATE LAUNDRY, INC, * April 3, 2003
8 et al. *
9 Defendants * * *
10 * * * * *
11 Deposition of VERONICA JOHNSON, a witness
12 of lawful age, taken on behalf of the Defendants in the
13 above-entitled cause, pending in the District Court of
14 the United States for the District of Maryland, before
15 Dawn L. Venker, a Notary Public in and for Baltimore
16 County, Maryland, at 7 St. Paul Street, 15th Floor,
17 Baltimore, Maryland 21202, on 3rd day of April, 2003.
18 * * * * *
19 APPEARANCES:
20
21 PHILIP SIMON, Esquire
 For the Plaintiffs
 JEANNE M. PHELAN, Esquire
 For the Defendants
ALSO PRESENT: BRAD MINETREE

Reported By: Dawn L. Venker

TOWSON REPORTING COMPANY
(410) 828-4148

1 schedule after the change to the four-day week?

2 A Was there any more changes?

3 Q Uh-huh.

4 A Nothing but no more overtime. No more

5 overtime for me.

6 Q Were there other people who were getting
7 overtime?

8 A Yes.

9 Q Who was getting overtime?

10 A Latinos.

11 Q Who?

12 A I don't know their names, but it was quite
13 a few of them.

14 Q How did you know they were getting
15 overtime?

16 A Because I seen them when I was leaving at
17 my regular time and they were still there.

18 Q Okay, and what work area was it -- this
19 that these people were working?

20 A It was all around.

21 Q All around?

1 A No specific area. All around to different
2 machines. Whatever machine -- gowns, short pieces.
3 The dryers. Soil room.

4 Q Did you ask for overtime?

5 A Yes, I did.

6 Q Who did you ask?

7 A I asked Brad for overtime.

8 Q In 1999?

9 A Well, it was continued -- overtime was
10 continued from the year onto '99. When I asked John
11 Fitzgerald about it, he said no more overtime.

12 Q Did you tell him that the Hispanics were
13 working overtime?

14 A He could see it. I really didn't have to
15 tell him, but I did mention it to him.

16 Q You did mention it to him?

17 A Uh-huh.

18 Q Tell me what you told him.

19 A I just asked him why was there no more
20 overtime. He said it was no more right there in that
21 area. I don't remember what he was saying. Something

1 went to the four-day-a-week schedule?

2 A Right.

3 Q Do you know why your schedule changed?

4 A Why my schedule changed?

5 Q Uh-huh.

6 A My schedule changed, because when we signed
7 the open letter, that he knew the signature of some
8 people was on there. They changed the schedule.

9 Desiree Rodman said that he was going to fix everyone
10 that signed the open letter. He'll change their
11 schedule, or whatever to the schedule.

12 Q How soon did this happen after you signed
13 your open letter?

14 A Maybe two or three days.

15 Q Tell me what Desiree Rodman said.

16 A Desiree Rodman said Brad said that everyone
17 that signed -- put their signature on the open letter,
18 that he was going to fix them and change their
19 schedule. Change their schedule. Just mess with them.
20 Harass them is what she meant.

21 Q Do you know whether that actually happened?

1 A It actually happened.

2 Q Did everyone who signed the letter have
3 their schedule changed?

4 A Yeah. Most of them. The main ones I knew,
5 yeah.

6 Q Who were the main ones you knew?

7 A Me. Lavern. Gloria. Howard White. I
8 can't -- Carolyn Shoemaker. I don't know his real
9 name, but they called him Speedy. I don't know his
10 real name anyway.

11 Q Speedy Hernandez?

12 A Yeah.

13 Q Anybody else?

14 A Not that I can recall right now.

15 Q Tell me about the open letter. How is it
16 that you came to sign that?

17 A I read it, and let me see. We was at the
18 meeting and we read -- I read the open letter, and, you
19 know, it described discrimination and everything. I
20 read the whole thing.

21 Q And what meeting was that?

1 A It was at a union meeting.

2 Q Do you remember where the meeting was held?

3 A Where it was held?

4 Q Uh-huh.

5 A It was on Dukeland and Wilkens Avenue. I
6 can't -- it was a union hall. I can't recall the union
7 hall.

8 Q What happened after the meeting?

9 A We just had a meeting about the harassment
10 that was going on, about us blacks and how he treated
11 us. And changed our schedule and different things. We
12 talked about it.

13 Q Were there people whose schedule was
14 changed at the time of that union meeting?

15 A Were there people down there?

16 Q Were there people -- you said you were
17 talking about how the schedules had been changed. Were
18 there people who complained at that union meeting that
19 their schedules had been changed?

20 A That had to be the last meeting, but it was
21 different things about harassment. And how we was

1 being treated. And how we was talked to, you know.
2 Just different things about the meeting. How we
3 weren't treated fair. How long we was there and wasn't
4 getting a raise, so.

5 Q You don't remember any of the people who
6 were complaining?

7 A Lavern. Gloria. Howard White. I can't
8 remember some of the other people. There was a lot of
9 people there. I know them mostly by faces and not by
10 names.

11 Q Had you gotten raises while you were at
12 Up-To-Date?

13 A Two.

14 Q Tell me about those.

15 A Only thing I can tell you about them, I
16 started out -- I started there making 4.75 an hour.
17 When they ended up, I was at 5.75. So I don't really
18 know, but he -- Brad had told me that I had gotten a
19 raise. I don't recall when they were, but before I
20 finished I made 5.75.

21 Q Did you ask for any raises?

1 Mr. Fitzgerald?

2 A She didn't say much. She was just -- I
3 don't know, she was like mad. She really didn't say
4 too much.

5 Q Other than the meeting with Mr. Fitzgerald,
6 did anyone else in management at Up-To-Date discuss
7 either the open letter or union stuff with you?

8 A No. No one else.

9 MR. SIMON: Can we please take a brief
10 moment.

11 (A recess was taken.)

12 Q In your answer to interrogatories, you
13 claim that you told Mr. Fitzgerald that Brad Minetree
14 was terrible.

15 A Uh-huh.

16 Q What does that mean.

17 A It means he has a very terrible temper.

18 Q Tell me about that. How did you know about
19 that?

20 A I was there in the plant. You just know
21 when he gets angry, he just lash out and use profanity.

1 Just cussing at the blacks. Not me in particular, but
2 sometimes he get a temper.

3 Q How often did this happen?

4 A How often do it happen?

5 Q Uh-huh.

6 A If he -- if he get upset, you know. I'm
7 not going to say often. It wasn't a usual thing he
8 did. Now and then he would use profanity.

9 Q Do you know why he would get upset on those
10 occasions?

11 A I don't know why. Just whatever somebody
12 did or something. I don't know, you know.

13 Q Were any -- did any of those situations
14 happen close-up to you that you could see what had
15 happened to make him angry?

16 A No, he probably seen it before he said. He
17 seen it and then he said it.

18 Q I'm asking you if you saw it. If you knew
19 it.

20 A No, I did not. I just heard him use
21 profanity.

1 say anything that you thought was racial?

2 A I never heard.

3 Q Did you have much interaction with David?

4 A No. Not really.

5 Q Did you ever hear Nancy say anything you
6 thought was racial?

7 A Yes.

8 Q What did you hear her say?

9 A I heard her on the PA make a statement
10 that, "All blacks want to do is get high, and Latinos,
11 they want something out of life."

12 Q When did that happen?

13 A '97 or '98. I'm not quite sure what year,
14 but it was between those two years.

15 Q Were you working when this happened?

16 A I was working.

17 Q Was it during working time or break time?

18 A It was during working time.

19 Q Did you say anything to anybody about that?

20 A No. Just talk. We talked among ourselves
21 and we heard it was like, hmm. You know, she said

1 A Yes.

2 Q And what did you do with them when you saw
3 them?

4 A I talked to them. Talked.

5 Q What did you talk about?

6 A Talking about union. You know union, and
7 fairness, and about work. You know, workplace.

8 Q Did you know if any of the other employees
9 were involved with the union before you went out and
10 talked with them?

11 A No.

12 Q Did you ever talk with Herman Datcher about
13 the union?

14 A Herbert?

15 Q Herbert Datcher.

16 A Okay. Did I ever talk to him?

17 Q Uh-huh.

18 A No.

19 Q Did you ever talk with him?

20 A Yeah, I talked to him.

21 Q About what?

1 A We talked after we got -- you know, going
2 to the union meeting, yeah.

3 Q Before the union meetings, did you ever
4 talk with him?

5 A We talked a little, yeah. We talked about
6 how they disrespect him, some of the ways. We talk
7 about it wasn't fair or something. He was mad also.
8 You know, talk.

9 Q Do you know specifically what it was that
10 wasn't fair regarding him?

11 A No, not really.

12 Q Did you ever talk with Melvin Newsome about
13 the union?

14 A Yes.

15 Q When did you talk with Mr. Newsome?

16 A It was inside the building, but it was like
17 they disrespecting them in the back in the soil room.
18 He didn't think they. He mostly said David.

19 Q Do you know what he meant when he said
20 disrespected him?

21 A Kind of like disrespecting, cursing him.

1 Saying anything and everything. That's what he said.

2 Q How about Rudolph Curtis, did you ever talk
3 with him about the union?

4 A About the union?

5 Q Uh-huh.

6 A No, we just talked about how -- disrespect
7 too. That's -- talked about disrespect. How they
8 talked to him. How they talked to him.

9 Q Do you know what it was he was referring
10 to?

11 A How they talked to him. I don't even know.

12 Just how they talked to him. They didn't know how to
13 talk to people, or something he said. Not really.

14 Q Do you remember when you talked with
15 Mr. Curtis about this?

16 A Curtis. That was awhile ago. Awhile. It
17 was awhile ago I talked to him. That would have been
18 some -- maybe '95. Something like that.

19 Q So a long time ago?

20 A Yeah, that's a long time for him. For him.

21 Q During the period 1998 and 1999, did you

1 have conversations with him?

2 A With him?

3 Q Rudolph Curtis.

4 A No.

5 Q How about Joseph Lloyd, did you ever talk
6 with Joseph Lloyd?

7 A Yeah, I talked to him. It's been -- it's
8 been awhile. Maybe -- maybe about a year and a half,
9 or something like that.

10 Q What did you talk with Mr. Lloyd about?

11 A He just talked about the same thing. Like
12 little -- how they talk to people. And how they didn't
13 respect them.

14 Q Do you remember any specifics?

15 A Mostly the same. Just cussing and saying
16 things to him. That's what he said.

17 Q We've talked about the fact that you had
18 conversations with Lavern and Gloria Martin and Howard
19 White?

20 A Right.

21 Q Were there any other people that you talked

1 Q Did you ever hear any of the managers at
2 Up-To-Date disrespecting any employees who were
3 Hispanic?

4 A No. Never heard.

5 Q Did you ever hear Brad get angry at anybody
6 who was Hispanic?

7 A Did I ever hear him get angry with anybody
8 that was Hispanic. No.

9 Q Did any Hispanics work in the area where
10 you worked?

11 A Yeah, it was a few.

12 Q Do you remember who any of them were?

13 A No, I don't know their names. Their faces.

14 Q What did they look like?

15 A They were, you know, Hispanic. They were
16 nice looking. Nice long hair.

17 Q Let's go one by one because obviously --

18 A You know, it was different ones. All of
19 them might not be the same. Might put two or three on
20 blankets, or couple on short pieces. Wasn't that many
21 over there. Like, spread it around.